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Attorney for Abelardo Martinez

UNITED STATES DISTRICT COURT

DISTRICT OF NEVADA

UNITED STATES OF AMERICA,

Plaintiff,

vs.

ABELARDO MARTINEZ,

Defendant.

CASE NO: 2:17-cr-169-KJD-VCF

**STIPULATION AND ORDER TO
DISMISS PETITION FOR SUMMONS
FOR OFFENDER UNDER SUPERVISION
AND TO CONTINUE ON SUPERVISED
RELEASE**

IT IS HEREBY STIPULATED AND AGREED, by and between SUSAN CUSHMAN, ESQ., Assistant United States Attorney, and CHRISTOPHER R. ORAM, ESQ., counsel for ABELARDO MARTINEZ, that the Government's Petition for Summons for Offender Under Supervision be dismissed. The parties further stipulate that Mr. Martinez will continue for the remainder of his term on supervised release. The parties further stipulate that the sentencing hearing currently scheduled for June 10, 2021, be vacated because it is unnecessary.

The parties agree to this stipulation for the following reasons:

1. On February 2, 2021, Mr. Martinez admitted to violations 1A and 1B in the Petition to Revoke Supervised Release. Mr. Martinez was allowed to continue on supervised release after the hearing.

- 1 2. Since that date, Mr. Martinez has complied with all of the requirements of his
2 supervised release.
3 3. Counsel for Mr. Martinez has spoken with the Government, and the Government
4 agrees to dismiss the Petition and allow Mr. Martinez to continue with his term
5 of supervised release.
6 4. Counsel for Mr. Martinez has spoken with United States Probation, and they also
7 agree to dismiss the Petition and allow Mr. Martinez to continue with his term
8 of supervised release.

8 DATED: June 1, 2021.

9 Respectfully submitted,

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11 /s/ Christopher R. Oram
12 CHRISTOPHER R. ORAM, ESQ.
13 520 S. Fourth Street, Second Floor
14 Las Vegas, Nevada 89101
15 *Counsel for Abelardo Martinez*

/s/ Susan Cushman
SUSAN CUSHMAN, ESQ.
501 Las Vegas Boulevard, South,
Suite 1100
Las Vegas, Nevada 89101
Counsel for the United States of America

16 IT IS SO ORDERED.

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19 UNITED STATES DISTRICT JUDGE

20 DATED this 2nd day of June, 2021.
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